

February 27, 2024

VIA ECF

Magistrate Judge Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn NY 11201

**Re: *State Farm Mut. Auto. Ins. Co. v. Metro Pain Specialists P.C.*, 1:21-cv-05523
Joint Ltr. re Status of Compliance with Orders to Show Cause**

Dear Judge Kuo:

Plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company (collectively, “Plaintiffs”) and defendants Yan Moshe, Hackensack Specialty ASC LLC (f/k/a Dynamic Surgery Center, f/k/a Excel Surgery Center LLC), Integrated Specialty ASC LLC (f/k/a HealthPlus Surgery Center LLC), Reuven Alon, Columbus Imaging Center LLC, and Medaid Radiology LLC (collectively, “Defendants”) write jointly as a follow up to the discovery conference held on February 22, 2024, regarding the status of Defendants’ compliance with this Court’s orders compelling production of revised written discovery responses.

Pursuant to the Court’s Minute Entry and Order on February 22, counsel met and conferred on February 23 regarding outstanding issues with Defendants’ written discovery responses. During the meet and confer, the parties discussed specific deficiencies concerning Defendants’ written responses and agreed that Defendants would serve revised written responses addressing those issues by March 15. There are no additional disputes between the parties to raise with the Court at this time relating to the discovery conference held on February 22.

Thank you for Your Honor’s attention.

Respectfully Submitted,

By: /s/ Christopher T. Cook

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